

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

In re:

Case No. **20-33177-KRH**

**Kandise Nadine Lucas**  
514 East Williamsburg Road  
Sandston, VA 23150  
SSN/ITTN: xxx-xx-2827  
**Debtor**

**Chapter 13**

**NOTICE OF MOTION AND HEARING**

Come now, Debtor(s), by counsel, having filed a Motion to Extend the Automatic Stay with the Court pursuant to 11 U.S.C. § 362(c)(3)(B).

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one.**

**NOTICE IS HEREBY GIVEN THAT A HEARING ON THIS MOTION WILL BE HELD AT THE UNITED STATES BANKRUPTCY COURT, U.S. COURTHOUSE, 701 EAST BROAD STREET, COURTROOM 5000, RICHMOND, VIRGINIA, 23219, ON AUGUST 19, 2020, AT 12:00 P.M.**

If you want to be heard on this matter, then on or before three (3) days from the date of the hearing, you or your attorney must:

1. File with the court, at the address below, a written response pursuant to Local Rule 9013-1(H). If you mail your response to the Court for filing, you must mail it early enough so that the Court will **receive** it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street, Suite 4000  
Richmond, VA 23219

2. You must also mail a copy to:

**KIMBERLY A. CHANDLER, VSB# 47897**  
**ELIZABETH EGAN, VSB# 44849**  
**CHANDLER LAW FIRM**  
P.O. Box 17586  
Richmond, VA 23226  
Office: (804) 353-1971  
Fax: (480)393-5764  
Counsel for Debtors

**CHANDLER LAW FIRM**  
P.O. Box 17586  
Richmond, VA 23226

3. Attend the hearing scheduled above.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting the requested relief.

Respectfully submitted,

**Kandise Nadine Lucas**  
By Counsel

By: /s/ Kimberly A. Chandler  
Kimberly A. Chandler, VSB# 47897  
Elizabeth Egan, VSB# 44849  
**CHANDLER LAW FIRM**  
Counsel for Debtors

**CERTIFICATE OF SERVICE**

I certify that on August 3, 2020, a copy of this Notice of Motion and Hearing has been mailed electronically or via first class mail to the Chapter 13 Trustee, the United States Trustee and all creditors as set forth on the attached mailing matrix.

/s/ Kimberly A. Chandler  
Kimberly A. Chandler, VSB# 47897  
Elizabeth Egan, VSB# 44849  
**CHANDLER LAW FIRM**  
Counsel for Debtors

**UNITED STATES BANKRUPTCY COURT  
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In re:

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SSN/ITTN: xxx-xx-2827  
**Debtor**

**Chapter 13**

**MOTION TO EXTEND THE AUTOMATIC STAY**

**COMES NOW** Kandise Nadine Lucas (the “Debtor”), by counsel, pursuant to 11 U.S.C. § 362(c)(3)(B), file the following Motion to Extend the Automatic Stay and affirmatively state as follows:

**Jurisdiction**

1. Jurisdiction of this Court over the instant matter is based upon 28 U.S.C. §§1334 and 157 in that this action arises in and relates to the bankruptcy case of the Debtor(s), a Chapter 13 case having been filed in this Court on July 23, 2020 (hereinafter the “Petition Date”).

2. This proceeding is a core proceeding under 28 U.S.C. §157(b)(2)(A) and (G).

3. Venue is proper pursuant to 28 U.S.C. §1409.

**Background Facts**

4. On July 23, 2020, the Debtor filed in this Court a petition for relief (the “Instant Case”) under Chapter 13 of the Bankruptcy Code, 11 U.S.C. 101, et seq.

**KIMBERLY A. CHANDLER, VSB# 47897**  
**CHANDLER LAW FIRM**  
P.O. Box 17586  
Richmond, VA 23226  
Office: (804) 545-0737  
Fax: (480)393-5764  
Counsel for Debtors

5. Carl M. Bates was appointed to serve as Chapter 13 Trustee in this case (the “Trustee”).

6. The Debtor has filed two (2) prior bankruptcy cases in this Court: Chapter 7 bankruptcy filed on December 01, 2004, and discharged on May 04, 2005 (**Case No. 04-41057**); Chapter 13 bankruptcy filed on February 24, 2020, and dismissed on July 17, 2020 (**Case No. 20-30950**) (the “Prior Case”).

7. During the pendency of the Previous Case, the Debtor failed to meet procedural deadlines, causing the case to be dismissed. (Affidavit by Debtor to be filed via Pacer prior to hearing).

#### **Facts of the Instant Case**

8. In the Instant Case, the Debtor proposes a Chapter 13 Plan (the “Plan”) that commits all of her disposable income.

9. Because the Instant Case was filed within one (1) year of the dismissal of the Previous Case, the automatic stay in the Instant Case will expire “with respect to any action taken with respect to a debt or property securing such debt or with respect to any lease . . . on the 30th day after [the Petition Date],” unless the Court extends the automatic stay. 11 U.S.C. § 362(c)(3)(A) and (B).

10. Thus the Court should find the Instant Case has been filed in good faith and enter an Order extending the automatic stay as to all creditors, as to the Debtor and her property, and as to the property of the estate for the duration of the Instant Case.

WHEREFORE, the Debtor respectfully request that this Honorable Court enter an Order extending the automatic stay as to all creditors, as to the Debtor and her property, and as to the property of the estate for the duration of the Instant Case and for such other

and further relief as to the Court shall be deemed appropriate.

Respectfully submitted,

**Kandise Nadine Lucas**

By Counsel

By: /s/ Kimberly A. Chandler  
Kimberly A. Chandler, VSB# 47897  
Elizabeth Egan, VSB# 44849  
**CHANDLER LAW FIRM**  
Counsel for Debtors

**CERTIFICATE OF SERVICE**

I certify that on August 3, 2020, a copy of the foregoing was mailed electronically or via first class mail, postage prepaid, to the Standing Chapter 13 Trustee, the United States Trustee, and all creditors as set forth on the attached mailing matrix.

/s/ Kimberly A. Chandler  
Kimberly A. Chandler, VSB# 47897  
Elizabeth Egan, VSB# 44849  
**CHANDLER LAW FIRM**  
Counsel for Debtors

Label Matrix for local noticing

0422-3

Case 20-33177-KRH

Eastern District of Virginia

Richmond

Mon Aug 3 10:22:01 EDT 2020

Advocates for Equity in Schools

4206 Chamberlayne Avenue

Richmond, VA 23227-5010

United States Bankruptcy Court

701 East Broad Street

Richmond, VA 23219-1888

AIS Portfolio Services, LP

4515 N Santa Fe Ave

Oklahoma City, OK 73118-7901

Amanda Simons

11901 Iron Bridge Road

Chester, VA 23831-1458

Ashley Funding Services

c/o Resurgent Capital Services

PO Box 10587

Greenville, SC 29603-0587

Ballato Law Firm PC\*\*

3721 Westerre Pkwy

Suite A

Richmond, VA 23233-1332

Capital One Bank

Attn: Bankruptcy

Po Box 30285

Salt Lake City, UT 84130-0285

Capital One Bank (USA), N.A.

by American InfoSource as agent

4515 N Santa Fe Ave

Oklahoma City, OK 73118-7901

Capital One Financial

1680 Capital One Dr

Mc Lean, VA 22102-3407

Charles Lucas

514 East Williamsburg Road

Sandston, VA 23150-1703

Cjw Medical Center

Resurgent Capital Services

PO Box 1927

Greenville, SC 29602-1927

Commonwealth Lab Consultants

PO Box 36559

Martinsville, VA 24115-5468

EdFinancial Services

Attn: Bankruptcy

Po Box 36008

Knoxville, TN 37930-6008

First Investors Corporation\*

380 Interstate North Parkway

Ste 300

Atlanta, GA 30339-2222

First Investors Servicing Corporation

380 Interstate North Parkway Ste 300

Atlanta, GA 30339-2222

Henrico Courts

4301 Parham Road

Henrico, VA 23228-2745

Henrico Doctor's Hospital

Resurgent Capital Services

PO Box 1927

Greenville, SC 29602-1927

Kim Taylor

1409 Eastridge Road

Henrico, VA 23229-5501

Meridian Resource Company

PO Box 659940

San Antonio, TX 78265-9138

NAPA Virginia

PO Box 8005

Cleveland, TN 37320-8005

(p)NATIONSTAR MORTGAGE LLC

PO BOX 619096

DALLAS TX 75261-9096

Navient Solutions Inc

Po Box 9500

Wilkes Barre, PA 18773-9500

Sheltering Arms Hosp

Applied Business Services

617 Southside Rd

Edenton, NC 27932-8922

Synchrony Bank/Amazon

Attn: Bankruptcy

Po Box 965060

Orlando, FL 32896-5060

Synchrony Bank/Amazon

Po Box 965015

Orlando, FL 32896-5015

Thomas H. Roberts & Assoc PC

105 S. 1st Street

Richmond, VA 23219-3718

U.S. Attorney's Office

919 East Main Street, Suite 1900

Richmond, VA 23219-4625

Valley Credit Service, Inc

P.O. Box 7090

Charlottesville, VA 22906-7090

Wells Fargo

7711 Plantation Rd #

R4058015

Roanoke, VA 24019-0000

Wells Fargo Bank NA  
Attn: Bankruptcy  
1 Home Campus Mac X2303-01a  
Des Moines, IA 50328-0001

Wells Fargo Bank NA  
Credit Bureau Dispute Resoluti  
Des Moines, IA 50306-0000

Carl M. Bates  
341 Dial 866-813-0912 Code: 8576180  
P. O. Box 1819  
Richmond, VA 23218-1819

John P. Fitzgerald, III  
Office of the US Trustee - Region 4 -R  
701 E. Broad Street, Ste. 4304  
Richmond, VA 23219-1849

Kandise Nadine Lucas  
514 East Williamsburg Road  
Sandston, VA 23150-1703

Kimberly Alice Chandler  
Chandler Law Firm  
P.O. Box 17586  
Richmond, VA 23226-7586

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Nationstar Mortgage, LLC  
D/B/A Mr. Cooper  
PO Box 619096  
Dallas, TX 75261-9741

End of Label Matrix	
Mailable recipients	35
Bypassed recipients	0
Total	35